

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

In re POLYURETHANE FOAM ANTITRUST)	
LITIGATION)	
)	MDL Docket No. 2196
)	Index No. 10-MD-2196 (JZ)
This document relates to:)	
)	
ALL CASES)	
)	

[PROPOSED] JOINT SCHEDULING ORDER

Pursuant to the parties' joint submission, the Court Orders as follows:

1. The Parties shall present to the Court a joint stipulation and proposed order on production of transaction data and documents by **July 29, 2011**. To the extent the parties are unable to agree with respect to any aspect of the proposed order, the Parties shall also submit their respective positions on those aspects of the proposed order by **July 29, 2011**.
2. Subject to further Order of the Court upon reasonable application by one or more of the Parties, all fact discovery shall be completed by **October 15, 2012**.
3. Absent good cause shown, motions to compel fact discovery shall not be filed after **September 14, 2012**.
4. The deadline for adding new parties shall be **March 1, 2012**.
5. The Parties shall submit a joint proposal regarding page limitations on briefing for class certification motions and responses on or before **February 17, 2012**.
6. The direct purchaser and indirect purchaser Plaintiffs shall file their respective motions for class certification and supporting memorandum and disclosures in support of class certification, and shall serve any expert witness reports and, concurrently, any materials, data or

information considered in forming the opinions contained in the reports, on or before **April 23, 2012.**

7. The direct purchaser Plaintiffs' class certification experts and the indirect purchaser Plaintiffs' class certification experts shall be made available for deposition and deposed by **May 25, 2012.**

8. Defendants' shall file oppositions to direct purchaser Plaintiffs' and indirect purchaser Plaintiffs' respective motions for class certification, memoranda in opposition to the motions, and disclosures in support of their opposition, and shall serve any expert witness reports and, concurrently, any materials, data or information considered in forming the opinions contained in the reports, on or before **June 29, 2012.**

9. Defendants' class certification experts shall be made available for deposition and deposed by **August 9, 2012.**

10. Direct Purchaser Plaintiffs and Indirect Purchaser Plaintiffs shall file their respective replies in support of class certification and shall serve any expert reports and, concurrently, any materials, data and information considered in forming the opinions contained in the rebuttal reports, on or before **August 27, 2012.** Rebuttal experts shall be strictly limited to responding to new matters raised in the reports or in depositions of defendants' experts.

11. Direct Purchaser Plaintiffs' and Indirect Purchaser Plaintiffs' respective class certification rebuttal experts shall be made available for deposition and deposed, as to any rebuttal issues and opinion only, by **September 28, 2012.**

12. The date or dates for any hearing or hearings on Direct Purchaser Plaintiffs' and Indirect Purchaser Plaintiffs' motions for class certification shall be established by the Court upon completion of the depositions of class experts.

13. **Within 30 calendar days after the Court's ruling on the motions for class certification,** the Parties shall provide to the Court a proposed amended Joint Case Schedule regarding discovery of merits experts, the filing of dispositive motions, motions in limine and other final, pre-trial matters.

14. Should any aspect of this Scheduling Order vary from provisions contained in the Local Rules, compliance with such Local Rule(s) is excused.

JUDGE JACK ZOUHARY
U.S. DISTRICT JUDGE

ENTERED